

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

:
: Chapter 9
:
: Case No. 13-53846
:
: Hon. Steven W. Rhodes
:

**NATIONAL PUBLIC FINANCE GUARANTEE
CORPORATION’S FACT WITNESSES RELATED
TO THE PROPOSED PLAN OF ADJUSTMENT**

Pursuant to the *Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment* [Doc. No. 4202], National Public Finance Guarantee Corporation (“National”), by and through its undersigned counsel, hereby identifies the following witnesses and subjects that each witness will address.

1. National identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the confirmation hearing (the “Confirmation Hearing”) on the *Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Doc. No. 4392] (the “Plan”).¹

¹ Capitalized terms undefined herein shall have the meanings ascribed to them in the Plan.

NO.	NAME/TITLE	TESTIMONY TOPICS
1.	Adam T. Bergonzi, Managing Director & Chief Risk Officer National Public Finance Guarantee Corporation	<ul style="list-style-type: none"> • National's insurance policies with respect to the DWSD Bonds. • The Plan's treatment of the DWSD Bonds. • The Plan's impact on National.
2.	A corporate representative of the City pursuant to Fed. R. Civ. P. 30(b)(6).	<ul style="list-style-type: none"> • Topics and matters identified in the <i>Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6)</i> [Doc. No. 4453].
3.	Any fact witnesses identified by the City and parties objecting to the Plan.	<ul style="list-style-type: none"> • Topics and matters identified in the <i>Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6)</i> [Doc. No. 4453].
4.	Any custodian of records necessary to authenticate documents.	<ul style="list-style-type: none"> • Topics and matters identified in the <i>Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6)</i> [Doc. No. 4453].

2. National reserves the right to amend its list of fact witnesses, or supplement the testimony topics associated with each witness referenced above, as may be necessary to address any amendments to the Plan.

3. As discovery is still being conducted in this matter, National reserves the right to amend this list of fact witnesses, or supplement the topics associated with each witness referenced above that come to the attention of National as

prompted by evidence presented at or before the Confirmation Hearing. National further reserves the right to amend this disclosure based on any rulings from the Court at the pre-trial conference or otherwise.

Dated: May 12, 2014

Respectfully submitted by,

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